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January 29, 2007

Luly Massaro Clerk, Rhode Island Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888

Re: Docket No. 3804 - National Grid Affordable Energy Plan

Dear Ms. Massaro:

I enclose the original and nine copies of the Motion of the George Wiley Center to Intervene as a Full Party in the above docket.

Thank you.

Sincerely,

B. Jean Rosiello

cc: Service List by email

IN RE: NATIONAL GRID AFFORDABLE

ENERGY PLAN

Docket No. 3804

MOTION OF THE GEORGE WILEY CENTER TO INTERVENE AS A FULL PARTY

The George Wiley Center, by its attorney, moves under Rule 1.13 of the Rules of Practice and Procedure of the Public Utilities Commission (PUC) to intervene as a full party in this action on the following grounds:

- 1. The George Wiley Center is a state-wide non-profit organization with headquarters in Pawtucket, Rhode Island.
- 2. The George Wiley Center's mission is to conduct community organizing and advocacy on behalf of all low-income Rhode Islanders.
- The George Wiley Center has a long history of advocacy on behalf of low-income Rhode Islanders before the PUC.
- 4. The interests of the George Wiley Center are such that intervention is necessary and appropriate under PUC Rule 1.13(b). In particular, under PUC Rule 1.13(b)(2) and (3), the George Wiley Center's low-income constituents will be directly affected by any PUC decision implementing the 2006 Comprehensive Energy Conservation, Efficiency and Affordability Act.

WHEREFORE, the George Wiley Center asks that its motion to intervene be granted.

Respectfully submitted, The George Wiley Center By its attorney,

B. Jean-Rosiello #2886

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CERTIFICATE OF SERVICE

I certify that on the 28th day of January, 2007, I emailed a copy of this document to all parties on the service list for this docket.